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A new Submission has been received to the Draft Nenagh Local Area Plan 2024-2030

Submission ID: NLAP-14

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Submission Text: Department of Transport observations on Draft Nenagh and Environs Local Area Plan 2024 - 2030

Since the previous plan was published there have been important policy developments which are relevant to accessible, integrated and sustainable public transport. The Department of Transport (DoT) considers these should be reflected in the proposed plan. The sections in the Nenagh Written Statement, titled: 3.4: 'Public Realm and Wayfinding', 5.3: 'Open Spaces and Amenities', 5.5: 'Nenagh as an Age Friendly and Inclusive Town', and section 6.2: 'Public Transport', should include material on UNCRPD, Universal Design, Whole Journey Approach, and to make specific reference to the 'Design Manual for Urban Roads and Streets interim note'.

1. Accessible public transport for All, and especially for Persons with Disabilities, Reduced mobility and Older People
 - the "whole of Government" National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities. For example, action 108 relates to the 'dishing' of footpaths and action 109 relates to accessible infrastructure, including bus stops. Lack of dishing is often cited as a major concern for wheelchair users. The National Disability Inclusion Strategy came to an end at the end of 2022. The Department of Children, Equality, Disability, Integration and Youth are working with the Disability Inclusion Strategy Steering Group to commence

work on the development of a UNCRPD implementation strategy. The DoT welcomes section 5.5 titled; ‘Nenagh as an Age Friendly and Inclusive Town’ (page 50) of the written statement; ‘Developing Age Friendly Towns revolves around the ethos that if you design for the young, you exclude the old, but if you design for the old, you include everybody’.

- the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) ratified by Ireland in 2018. The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas.
- the Design Manual for Urban Roads and Streets (DMURS) Interim Advice Note – Covid-19 Pandemic Response published in 2020. It includes guidance that designers should ensure that
 - o measures align with the principles of universal design,
 - o consider Government policy on accessibility for people with disabilities and
 - o consult people with disabilities to further appraise measures.
- References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.
- To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’. This refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment’. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.
- The Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity, particularly for people living outside the major cities and towns. Over 100 rural villages will benefit from frequent public transport service (at least three return trips daily) for the first time. The plan will also see a 25% overall increase in rural bus services, and over 60 new connections to regional cities from surrounding areas

DoT can assist with appropriate text in the development plan regarding integrated, accessible public transport.

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